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January 5, 2016

**BY ECF**

The Honorable Ann M. Donnelly  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

The Honorable Arlene R. Lindsay  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: *Simmons v. County of Suffolk, et al.*, 14 CV 3884 (AMD) (ARL)

Dear Judge Donnelly and Magistrate Judge Lindsay:

This firm, together with my colleagues at Cuti Hecker Wang LLP, represents Plaintiff Glynice Simmons in the above-referenced case, which recently was reassigned from Judge Seybert to Judge Donnelly. We write to renew our request, first made in our letter dated October 9, 2015 (Dkt. No. 34), that the Court schedule a conference at its earliest convenience to address the discovery schedule and any other open procedural issues. We are eager to move the case forward with respect to the County Defendants.

Thank you for your consideration.

Respectfully submitted,

/s/ Brett Klein

Brett H. Klein (BK4744)

cc: All Counsel (via ECF)